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6 **UNITED STATES DISTRICT COURT**  
7 **CLARK COUNTY, NEVADA**

8 ERIC PAIGE,

9 Plaintiff,

10 v.

11 NAVY FEDERAL CREDIT UNION,

12 Defendant.  
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CASE NO.: 2:21-cv-01255-GMN-VCF

**STIPULATION TO EXTEND NAVY  
FEDERAL CREDIT UNION'S TIME TO  
ANSWER OR OTHERWISE RESPOND  
TO THE COMPLAINT**

**[SECOND REQUEST]**

15 **STIPULATION TO EXTEND NAVY FEDERAL CREDIT UNION'S TIME TO**  
16 **ANSWER OR OTHERWISE RESPOND TO THE COMPLAINT**

(Second Request)

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18 IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff Eric Paige, through  
19 his counsel Craig B. Friedberg, Esq. and Taylor L. Kosla, Esq., and Defendant Navy Federal  
20 Credit Union, by and through its counsel, Lindsey H. Morales, Esq. that the date for Navy  
21 Federal Credit Union to answer or otherwise respond to Plaintiff's Complaint shall be extended  
22 from August 13, 2021 until August 30, 2021.

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1 This is the parties' second request, made in good faith and not for the purposes of delay. As  
2 an initial matter, the parties' prior stipulation erroneously extended Defendant Navy Federal  
3 Credit Union's response deadline to August 13, 2021. The intended extended deadline was  
4 August 14, 2021, mutually agreed to by the parties, and the inclusion of the August 13, 2021  
5 deadline was a scrivener's error. Unfortunately, this error was not discovered until today.

6 Pursuant to NRCP 6, the parties therefore intended for the Defendant to file its response  
7 and/or any additional requests for continuances by August 16, 2021. The parties therefore  
8 respectfully request the Court grant this stipulation as timely or, in the alternative, allow for the  
9 parties to produce declarations in support of the above statements if the Court deems necessary.

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During the previously granted extension, the parties in this matter cooperatively exchanged pertinent documents, records, and information related to Plaintiff's allegations. The parties have agreed to pursue settlement and are currently engaged in on-going substantive settlement negotiations which, if successful, will resolve this matter in full. Given this, the parties therefore request a second extension of time from August 16, 2021 until August 30, 2021.

**APPROVED AS TO FORM AND CONTENT:**

Dated: 08/16/2021

/s/Craig B. Friedberg

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Dated: 08/16/2021

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Dated: 08/16/2021

/s/Lindsey H. Morales

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**IT IS SO ORDERED.**

  
UNITED STATES MAGISTRATE JUDGE

**DATED:** 8-24-2021